

Affidavit in Support of an Application for Search Warrant

I, Jennifer Duke, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since September 2021. My current assignment is to the Portland Division, Pendleton Resident Agency. I received 21 weeks of training at the FBI Academy in Quantico, Virginia, where I learned about investigating violations of federal law, including violent crimes. My responsibilities include the investigation of federal criminal offenses, to include robbery, firearms violations, and assault, violent crimes, sex crimes, and crimes on the Confederated Tribes of the Umatilla Indian Reservation (CTUIR). Before joining the FBI, I investigated Counterintelligence threats for the Department of Defense. During the course of my employment as an FBI agent, I have participated in multiple investigations involving firearm offenses, violent crime, and child exploitation matters. I have interviewed subjects, participated in search warrants, collected, and reviewed evidence including with electronic devices, analyzed electronic devices, location data, requested legal process, and testified before grand jury and in open court. I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer and cellular media. I have also conducted investigations involving the sexual exploitation of children including for distribution, receipt, and possession of child pornography. I have participated in searches of a suspect's premises and assisted in gathering evidence pursuant to search warrants, including search warrants in child pornography investigations. I have participated in interviews of persons who attempt to possess and/or distribute child pornography.

2. I submit this affidavit in support of a criminal complaint and arrest warrant charging **Thomas Loren GOATLEY**, date of birth XX/XX/2003, with violations of 18 U.S.C. § 2252A(a)(2) – Distribution or Receipt of Child Pornography; and 18 U.S.C. § 875(c) – Interstate Threats.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Applicable Law

4. *Title 18, United States Code, § 2252A(a)(2)* makes it a crime to knowingly receive or distribute using any means or facility of interstate or foreign commerce any child pornography or material containing child pornography.

5. *Title 18, United States Code, § 875(c)* makes it unlawful to knowingly transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.

6. “Child pornography,” as defined in 18 U.S.C. § 2256(8), is any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged

in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

Information Regarding NCMEC

7. National Center for Missing & Exploited Children (NCMEC) was incorporated in 1984 by child advocates as a private, non-profit organization to serve as a national clearinghouse and resource center for families, victims, private organizations, law enforcement, and the public on missing and sexually exploited child issues. To further their mission to help find missing children, reduce child sexual exploitation, and prevent future victimization, NCMEC operates the CyberTipline and Child Victim Identification Programs. NCMEC makes information submitted to the CyberTipline and Child Victim Identification Programs available to law enforcement and uses this information to help identify trends and create child safety and prevention messages. As a national clearinghouse, NCMEC also works with electronic service providers (ESPs), law enforcement, and the public in a combined effort to reduce online child sexual exploitation. NCMEC does not act in the capacity of or under the direction or control of any government or any law enforcement agency. NCMEC does not independently investigate and cannot verify the accuracy of the information submitted by reporting parties.

8. CyberTipline Reports are initially submitted to NCMEC. Anyone can submit a CyberTipline Report, although the majority of CyberTipline Reports I review are submitted by ESPs such as Google, Facebook, Instagram, Yahoo, Microsoft, Dropbox, Tumblr, Snapchat, X (formerly known as Twitter) and the like. CyberTipline Reports from ESPs typically contain information about the subscriber, such as the subscriber's username, email address, telephone numbers, and IP address history. CyberTipline Reports also contain the child exploitation material that caused the ESP to initiate the report and sometimes message content. That child

exploitation material is often images or video files of child pornography as defined by federal law. NCMEC can also generate CyberTipline Reports for information received from the public through their phone line.

Statement of Probable Cause

Summary

9. Since at least March 2024, Thomas Loren GOATLEY of Umatilla, Oregon has placed numerous hoax calls to police departments, schools, and other institutions concerned with public safety across the United States. In these calls, GOATLEY claims that he is currently or is about to be sexually assaulting a child, and often provides a fake location where this crime is taking place. GOATLEY is also the subject of numerous CyberTipline Reports submitted to NCMEC, which report that multiple online accounts attributable to GOATLEY have distributed and/or received child pornography. During the execution of a federal search warrant on July 22, 2024, GOATLEY admitted to making the threatening phone calls described above and to receiving and distributing child pornography.

Umatilla Police Department Receives Out of State Complaints Regarding GOATLEY

10. On March 8, 2024, the Umatilla Police Department (UPD) received a complaint from the Helena (Montana) Police Department regarding an unknown male making calls to their local school that were sexual in nature. I reviewed a police report from Helena PD and learned that on March 8, 2024, the principal of Central Elementary School reported that his staff had received three calls from an unknown caller with the phone number 458-255-6492 (the “**Subject Phone Number**”). The caller was a male and told staff he was receiving oral sex from one of their students. The caller went into explicit detail. The caller identified himself as “Dale,” but provided no identifying information for the child. Helena PD learned the phone number belonged to a Thomas GOATLEY from Umatilla, Oregon and contacted UPD.

11. A short time after receiving the report from Helena, Montana, UPD received another complaint similar in nature from New Castle, Wyoming. I reviewed the New Castle PD report from the incident and learned that on March 8, 2024, the principal at New Castle Elementary School reported that a man called the main school line and said, “I have a girl. I have a girl. She has blonde hair.” The male identified himself as “Dale.” “Dale” stated he would not hurt the girl; he wanted her to give him a hand job and “head.” “Dale” said he would return the girl to the school after she finished making him “cum.” The principal never heard a noise from the girl but could hear “Dale” breathing louder and moaning. “Dale” then hung up. In response to this call, all Newcastle schools were placed in lockdown, preventing anyone from entering or exiting. Additionally, multiple law enforcement officers and agencies attempted to located “Dale” until New Castle PD eventually tracked the call to Umatilla, Oregon and contacted UPD.

12. UPD is familiar with GOATLEY and have investigated him in the past for making phone calls to public places that were sexual in nature. Based on the reports from Helena and New Castle, UPD made contact with GOATLEY, and his mother, Melissa GOATLEY, at his last known address of 248 Adams Court, Umatilla, Oregon. Both denied that GOATLEY made any phone calls that morning.

13. On April 18, 2024, UPD received a complaint from the Dearborn, Michigan Police Department regarding Thomas GOATLEY. I reviewed a police report from Dearborn PD and learned that on April 18, 2024, a male caller using the **Subject Phone Number** called the Dearborn PD and stated he was currently watching child pornography while his 12-year-old daughter was performing oral sex on him. The caller stated he was in room 5 at the Comfort Inn in Dearborn. Dearborn PD learned the phone number possibly belonged to someone named GOATLEY. Dearborn PD officers responded to Comfort Inn and learned there was no room 5,

and no one staying at the hotel by the name of Thomas GOATLEY. Dearborn PD then contacted UPD.

CyberTipline Reports

14. In addition to these reports, UPD received four CyberTipline Reports in which GOATLEY is listed as the subject. The CyberTipline Reports were submitted by X Corp (formerly Twitter, Inc) and Instagram, and showed GOATLEY sharing CSAM via the messaging functions on those applications. Pursuant to a search warrant signed by the Honorable Judge Russo on May 6, 2024, I downloaded and viewed the images reported by various ESPs to NCMEC. On June 26, 2024, I reviewed the CyberTipline Reports and identified the following user information and images/videos I believe to constitute the possession and distribution of CSAM.

15. CyberTipline Report 173799416

Submitter: Instagram

Incident Date: 09/08/2023

Sender Name: Thomas GOATLEY

DOB: 08/28/2003

Email: goatleythomas0828@gmail.com

Screen/Username: mentalbumrush

IP address: 75.164.190.40 on 09/08/2023 at 15:58:27

Filename:

NH3JbZ761XrGPGJB3740707832_6508111285904722_3130868780998090182_n.mpf
MD5: 1a305900ced5cc40248c2745e5d7e7e5

Description: A 0:49 second video showing a small female child and an adult woman masturbating an adult man. At 0:15 seconds, the video cuts to a scene where an erect penis is visible in the center of the screen. The male's face is not in view of the camera, but the male appears to be lying on his back on a bed, and his feet can be seen at the bottom of the bed. The female child is performing oral sex on the man. The girl's face is visible, and she appears to be between the ages of seven and nine. At approximately 0:35 seconds, the video cuts to a scene of a young child's buttocks facing the camera. An adult male penis is stroking the exterior area of the female's anus and vagina.

Filename:

I7ZvQKnoiYIalXmC374685920_6486649061400309_4869843907876634384_n.mp4
MD5: 6aa83fc9450849c218446500cd7eca13

Description: A 0:25 second video. A minor female, approximately 11-13 years of

age, is seen on her knees with an erect penis in her mouth.

16. In some cases, Instagram will submit the chats immediately preceding and following the sending of files that are flagged in a CyberTipline Report. The following messages were exchanged between the sender and recipient before and after the aforementioned video was uploaded on September 8, 2023 and were provided by Instagram as part of the CyberTipline Report:

Goatley - I'd like to see
Recipient - You have anything for inspiration
Goatley - Just a second
MD5: 6aa83fc9450849c218446500cd7eca13 image uploaded
Goatley - I have CP finally
Recipient- That's a good star

17. CyberTipline Report 179225856

Submitter: X Corp.

Incident Date: 11/12/2023

Direct Message Id: 1723765722667766114

Email: goatleythomas0828@gmail.com

Screen/Username: goatley_th17701

Filename: zAo6xgLmR05AxiGdvasvK5YDZY_oqoQEC7uqr_hLu0.mp4

MD5: 4e15d3fd63012697bc0c5037cfbc6bb0

Description: A 0:45 second video. A female child, approximately 11-13 years old, is seen licking the genital area of an infant. The female is then seen using her index finger to digitally penetrate the infant.

18. Between May and June of 2024, I learned of an additional 21 Cybertips identifying Thomas GOATLEY and/or the **Subject Phone Number** as the suspect associated with the upload and/or download of child pornography files.

19. On April 24, 2024, I received from Lumen Technologies the following subscriber information for IP Address: 75:164:190:40, timestamp September 8, 2023, at 15:58:27 UTC (the IP address associated with CyberTipline Report 173799416, described above):

- Name: Melissa GOATLEY
- Start Date: 09/02/2023 at 03:28:21

- End Date: 09/15/2023 at 06:25:39
- Address: 248 Adams Court, Umatilla, Oregon 97882

As described above, Melissa Goatley is the mother of Thomas GOATLEY.

Review of Phone Records Identifies Additional Interstate Calls Made to Schools, Police Departments

20. On June 24, I reviewed Verizon phone records provided for phone calls made from the **Subject Phone Number** between January 5, 2024, and April 30, 2024. I learned that on March 8, 2024, at 9:46AM Pacific Time, a 457-second was placed to New Castle Elementary School in New Castle, Wyoming. On March 8, 2024, at 9:41AM Pacific Time, a 65-second and a 3-second call were placed to Helena Elementary School in Helena, Montana. On March 18, 2024, at 11:43AM Pacific Time, a 205-second call was placed to the Dearborn Police Department in Dearborn, Michigan. These calls found in the Dialed Out calls history provided by Verizon corroborate the reports made to UPD.

21. According to the Verizon records, between February 17, 2024, and April 8, 2024, the **Subject Phone Number** also called NCMEC ten times, with the calls lasting between 71 seconds and 428 seconds each. Of these ten calls, five were reported by NCMEC in CyberTipline Reports, which I have reviewed. When NCMEC receives a call, the caller's phone number is logged by NCMEC as the source of the call and is labeled the Automatic Number Identification (ANI), regardless of whether the caller provides a different number during the call. All five of the CyberTipline Reports from NCMEC report an ANI of the **Subject Phone Number**. The reports also include audio recordings of the calls.

22. On June 27, 2024, I reviewed the following Cybertips and listened to the accompanying voice media that had been submitted by NCMEC concerning the ANI of the **Subject Phone Number**. The addresses and phone numbers included in the CyberTipline Reports reflect the information that was provided by the caller and were not verified by NCMEC.

Additionally, the "Description of Call" for each report reflects the notes entered by the NCMEC employee receiving the call. The information for each CyberTipline Report is below:

23. CyberTipline Report 187631657

Submitter: Dale Higgins 1550 Jackson Avenue Spokane, WA 99207 US
Phone: 5035732531

Description of Call: The caller is the child's father. The caller said that he and his wife are currently having sex with their child. The caller asked if they can keep going until law enforcement gets there.

24. CyberTipline Report 189523227

Submitter: The reporter stated his name is Eric Daniels.

Description of the Call: The caller is the child's father. the caller is reporting child molestation. The reported person stated he is going to get a blow job from his daughters and have sex with them. The caller previously made a report. About two minutes into the call, "Eric" asked the operator why she had not yet asked the age of his daughters.

25. CyberTipline Report 189523136

Submitter: Phone: **Subject Phone Number**

Description of the Call: The reporting person said he was currently having sex with his two daughters and then said he was climaxing. The operator asked for the caller's phone number and address and the caller says, "Oh, I'm cumming a little." and the call ends. The reporting person would not respond when asked for his address and then disconnected.

26. CyberTipline Report 191106280

Submitter: 418 Northeast Alora Seattle, WA

Description of the Call: The reporting person stated that he is having sex with his 15-year-old sister. He then stated, "I'm going to cum in her". He was asked for the address of the location this was occurring in and he stated, "shut up and listen to me rape my sister".

UPDATE The reporting person called back and provided an address. The reporting person may be masturbating during the calls.

27. CyberTipline Report 191106249

Submitter: Shawn Dorothy; Address: 418 Northeast Alora Seattle, WA

Description of the Call: The caller stated that he is in the process of penetrating his sister. During the call, the caller was masturbating.

28. I also learned that the **Subject Phone Number** made two calls to the Oregon State Police Amber Alert Tip Line on April 22, 2024. The **Subject Phone Number** was also

used to make more than 60 phone calls to schools, police departments, emergency lines, and animal shelters across Washington, Idaho, Montana, California, Colorado, Wyoming, North Dakota, Minnesota, New York, New Mexico, Georgia, and Tennessee.

Review of UPD Interaction with Thomas GOATLEY from March 2024

29. On June 28, 2024, I reviewed police body camera footage that was provided to me by UPD. The footage was from a UPD detective who interacted with GOATLEY and his mother, Melissa GOATLEY, on March 8, 2024, at GOATLEY's residence, 248 Adams Court, Umatilla, Oregon.

30. During the interview, GOATLEY denies making calls out of state on that day. GOATLEY provides his current phone number as the **Subject Phone Number**. GOATLEY's mother mentioned that GOATLEY plays video games in his room. GOATLEY stated he had "recently" just gotten this current phone/phone number.

Execution of Search Warrants and Interview of GOATLEY

31. On July 20, 2024, the Honorable J. Armistead signed a search warrant for the person of **Thomas GOATLEY** and his residence at 248 Adams Court, Umatilla, Oregon. On July 22, 2024, shortly after 6:00 a.m., the FBI and Umatilla Police Department executed the search warrant. When agents entered the house, they seized a black Android cell phone in a gold case, which was on the living room table and which **GOATLEY** stated belonged to him. **GOATLEY** was initially interviewed during the search and was later detained and transported to the FBI office in Pendleton, Oregon, where he was asked additional questions. **GOATLEY** was advised of his Miranda rights before both interviews and agreed to speak with investigators.

32. **GOATLEY** admitted that at least once in the last week, he paid money to another user on the social media application Discord for files containing child pornographic material.

GOATLEY told investigators that he conducted this activity with his Samsung cellular phone that was seized. **GOATLEY**'s phone was unlocked with his fingerprint.

33. **GOATLEY** was shown several social media usernames, and confirmed the following are current, or former usernames that **GOATLEY** used:

- a. Instagram: goatman.jones, mentalbumrush
- b. Email: goatleythomas0828@gmail.com
- c. X Corp: GoatleyThomas

34. Upon an initial review of **GOATLEY**'s cell phone via a Cellebrite download, I observed approximately 50 images and 40 videos that appear to be child pornography. Below are descriptions of three of those videos:

- a. Video 1: a 31-second video of a prepubescent girl being vaginally penetrated by an adult male.
- b. Video 2: a 35-second video of an adult male vaginally penetrating and ejaculating into a prepubescent girl.
- c. Video 3: a 1:44 video of a prepubescent girl masturbating an adult male, then being vaginally penetrated by the adult male.

35. During the interview, **GOATLEY** also admitted that he had on multiple occasions made calls to several schools and police departments that were of a sexual nature. During these phone calls, **GOATLEY** stated that he would sometimes describe performing sexual acts with a minor. **GOATLEY** stated he was masturbating during these calls.

36. Upon initial review of **GOATLEY**'s cellular phone via a Cellebrite download, I observed a text message received on February 21, 2024, from phone number 208-830-6858 that read as follows: *This is Officer York at Heritage. The school received a phone call from this*

number yesterday and you need to identify yourself. If you don't tell me who you are, I am going to open a criminal report, and charge you with telephone harassment. You can avoid this by just telling me who you are so we can discuss your phone call to the school.

37. I believe this text message is related to an outgoing call found in GOATLEY's phone records, dated February 20, 2024, to Heritage Middle School in Eagle, Idaho.

Conclusion

38. Based on the foregoing, I have probable cause to believe, and I do believe, that **Thomas GOATLEY** committed violations of 18 U.S.C. § 2252A(a)(2) – Distribution or Receipt of Child Pornography; and 18 U.S.C. § 875(c) – Interstate Threats. In consideration of the foregoing, I respectfully ask that this court issue the request complaint and arrest warrant for **Thomas GOATLEY**.

39. Prior to being submitted to the Court, this complaint and affidavit were reviewed by Assistant United States Attorney Mira Chernick. AUSA Chernick advised me that in her opinion, the documents are legally and factually sufficient to support the issuance of the requested complaint and warrant.

(By Telephone)

Jennifer Duke
Special Agent
Federal Bureau of Investigations

Sworn to telephonically pursuant to Fed. R. Crim. P. 4.1 at 8:52 a.m. am/pm on July 23 2024.

Youlee Yim You
HONORABLE YOULEE YIM YOU
United States Magistrate Judge